

AFFIDAVIT OF BARRY W. WARD

I, Barry W. Ward, do hereby testify that the following statements are true:

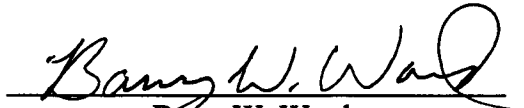
1. I am over the age of eighteen and competent to make this Affidavit and have personal knowledge of the facts stated herein.

2. I am a licenced attorney in the State of Arkansas and serve as one of three law clerks to United States District Judge Susan Webber Wright, Chief Judge for the Eastern District of Arkansas.

3. In my capacity as law clerk to Judge Wright, I was assigned, through random draw, the case of *Jones v. Clinton*, No. LR-C-94-290 (E.D.Ark.), and continue to remain so assigned.

4. On January 17, 1998, I attended the President's deposition with Judge Wright and was sitting at the conference table next to Judge Wright for the duration of the deposition. From my position at the conference table, I was able to observe the colloquy between Judge Wright and President Clinton's attorney, Robert S. Bennett, in which Mr. Bennett objected to certain questioning from James A. Fisher, Paula Jones' attorney, regarding Monica Lewinsky. In the course of his objection, Mr. Bennett made a statement to the effect that Ms. Lewinsky had filed an affidavit stating there was "absolutely no sex of any kind in any manner, shape or form, with President Clinton." From my position at the conference table, I observed President Clinton looking directly at Mr. Bennett while this statement was being made.

FURTHER AFFIANT SAYETH NOT.


Barry W. Ward

ACKNOWLEDGMENT

STATE OF ARKANSAS
PULASKI COUNTY

SUBSCRIBED AND SWORN to before a Notary Public on this 25th day of
January 1999.


Notary Public

My Commission expires:

17 June 2002

DECLARATION OF T. WESLEY HOLMES

My name is T. Wesley Holmes. I am over twenty-one years of age and I am fully competent to give this Declaration.

1. I am an attorney licensed to practice law in the State of Texas, the State of Arkansas and before the United States District Court for the Eastern District of Arkansas, among other courts. My firm, Rader, Campbell, Fisher & Pyke, represented Paula Jones in the civil action styled and numbered *Jones v. Clinton, et al.*, Civil Action Number 94-CV-290, In the United States District Court for the Eastern District of Arkansas (the "Jones Case"). I was actively involved in representing Mrs. Jones in that case.

2. I attended the deposition of William Jefferson Clinton on January 17, 1998.

3. On January 22, 1998, I signed a subpoena for the deposition of Betty Currie, a true copy of which is attached hereto as Exhibit "A." Ms. Currie was served with this subpoena on January 27, 1998.

4. On January 23, 1998, I served on the defendants in the Jones Case "Plaintiff's Supplement To Witness List," a true copy of which is attached hereto as Exhibit "B."

5. We, Mrs. Jones' lawyers in the Jones Case, subpoenaed Ms. Currie to give her deposition for two reasons. First, the testimony given by Mr. Clinton in his January 17, 1998, deposition and second, we had received what we considered to be reliable information that Ms. Currie was instrumental in facilitating Monica Lewinsky's meetings with Mr. Clinton and that Ms. Currie was central to the "cover story" Mr. Clinton and Ms. Lewinsky had developed to use in the event their affair was discovered.

6. I have been told that it has been suggested that the reason we subpoenaed Ms. Currie was a *Washington Post* article. This suggestion is incorrect. No *Washington Post* article played any part in my decision that we should subpoena Ms. Currie. Moreover, I do not recall any attorney in my firm saying anything about a *Washington Post* article in the discussions in which we decided to subpoena Ms. Currie.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 23, 1999.


T. Wesley Holmes

Issued by the
UNITED STATES DISTRICT COURT
 DISTRICT OF **COLUMBIA**

PAULA JONES,*Plaintiff,*

V.

WILLIAM JEFFERSON CLINTON*and***DANNY FERGUSON,***Defendants.***SUBPOENA IN A CIVIL CASE**CASE NUMBER:¹

LR-C-94-290

In the United States District Court
 For the Eastern District of Arkansas

ORIGINAL

TO: **BETTY CURRIE**
 1600 Pennsylvania Ave., NW
 Washington, D.C.

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

The Rutherford Institute
 733 15th Street N.W., Suite 410
 Washington, D.C. 20005

DATE AND TIME
 January 29, 1998
 3:00 p.m. ET

☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

PLACE

DATE AND TIME

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person designated, the matters on which the person will testify, Federal Rules of Civil Procedure, 30(b) (6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

T. Wesley Holmes

, ATTORNEY FOR PLAINTIFF

January 22, 1998

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

T. Wesley Holmes, Rader, Campbell, Fisher & Pyke, Stemmons Place, Suite 1080,
 2777 Stemmons Freeway, Dallas, Texas 75207, (214) 630-4700

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

EXHIBIT**A**

PROOF OF SERVICE

SERVED Date **01/27/98** Place **1604 NORTH CLEVELAND STREET
ARLINGTON, VA 22201**
TIME **7:42 P.M.**

SERVED ON (PRINT NAME)

MANNER OF SERVICE

BETTY CURRIE

PERSONALLY

SERVED BY (PRINT NAME)

TITLE

DAVID S. FELTER

PRIVATE PROCESS SERVER

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on **02/03/98**

Date

Signature of Server

CAPITOL PROCESS SERVICES

1827 18TH STREET, N.W.

WASHINGTON, D.C. 20009

Address of Server

(202) 667-0050

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fees.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected

matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

PAULA JONES,

Plaintiff,

v.

WILLIAM JEFFERSON CLINTON
and DANNY FERGUSON,

Defendants.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. LR-C-94-290

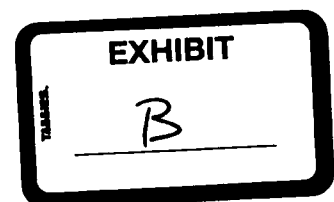
Judge Susan Webber Wright

(Under Seal)

PLAINTIFF'S SUPPLEMENT TO WITNESS LIST

Plaintiff Paula Jones hereby supplements her December 5, 1997 witness list. In addition to the persons previously designated, Plaintiff designates the following potential witnesses whose identities were unknown to plaintiffs on December 5, 1997:

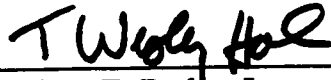
- | | |
|--|-----------------------------|
| 151. Sherri Butler | Little Rock, Arkansas |
| 152. Dr. Sam Houston | Little Rock, Arkansas |
| 153. Shelia D. Lawrence | San Diego, California |
| 154. Lucia Wyman | White House, Washington, DC |
| 155. Vince Kraeger | Boca Raton, Florida |
| 156. Selma Edelman | Los Angeles, California |
| 157. Custodian of records for
Speed Service, Inc. | Washington, D.C. |
| 158. Custodian of records for
O'Melveny and Myers, L.L.P. | New York, New York |



- | | | |
|------|--|-----------------------|
| 159. | Phillip D. Yoakum | Rogers, Arkansas |
| 160. | Vernon Jordan | Washington, D.C. |
| 161. | MacAndrews & Forbes
custodian of records and
Rule 30(b)(6) representative | New York, New York |
| 162. | U.S. Department of Defense
custodian of records and
Rule 30(b)(6) representative | Arlington, Virginia |
| 163. | Betty Currie | Washington, D.C. |
| 164. | Marsha Scott | Washington, D.C. |
| 165. | Debbie Schiff | Washington, D.C. |
| 166. | Barry Spivey | Little Rock, Arkansas |
| 167. | Bill Richardson | New York, New York |
| 168. | Revlon, Inc.
custodian of records and
Rule 30(b)(6) representative | New York, New York |

Additionally, Witness no. 80 on the original list was incorrectly identified as Monica Lewisky, but whose correct name is Monica S. Lewinsky.

Respectfully submitted,



Robert E. Rader, Jr.
State Bar of Texas No. 16453000
Donovan Campbell, Jr.
State Bar of Texas No. 03725300
James A. Fisher
State Bar of Texas No. 07051650
David M. Pyke
State Bar of Texas No. 16419700
T. Wesley Holmes
State Bar of Texas No. 09908495
J. McCord Wilson
State Bar of Texas No. 00785266

RADER, CAMPBELL, FISHER & PYKE
(A PROFESSIONAL CORPORATION)
Stemmons Place, Suite 1080
2777 Stemmons Freeway
Dallas, Texas 75207
Telephone: (214) 630-4700
Facsimile: (214) 630-9996

ATTORNEYS FOR PLAINTIFF
PAULA JONES

OF COUNSEL:

John W. Whitehead
Steven H. Aden
THE RUTHERFORD INSTITUTE
Post Office Box 7482
1445 East Rio Road
Charlottesville, Virginia 22906-7482
Telephone: (804) 978-3888
Facsimile: (804) 978-1789

CERTIFICATE OF SERVICE

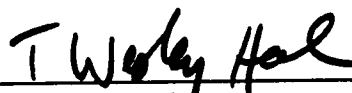
I hereby certify that on January 23, 1998, a true and correct copy of the foregoing document was served on all parties by service on their counsel of record at the addresses set forth below, in compliance with FED. R. CIV. P. 5.

Robert S. Bennett
Skadden, Arps, Slate, Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111

Kathlyn Graves
Wright, Lindsey & Jennings
200 West Capitol Avenue
Suite 2200
Little Rock, Arkansas 72201

Stephen Engstrom
Wilson, Engstrom, Corum, Dudley & Coulter
809 West Third Street
Little Rock, Arkansas 72202

Bill W. Bristow
216 East Washington
Jonesboro, Arkansas 72401



T. Wesley Holmes

CALLS FOR 202 4566566		CARRIER	TERM #	CONNECT	MIN	SEC	DATE
ORIG #	MONTH	DAY	COUNT				
202 562 3002	01	06	1	08:39	2	39	971205
202 562 3002	01	06	1	13:25	7	35	971205
202 562 3002	01	06	1	15:09	0	1	971205
202 562 3002	01	06	1	09:31	0	39	971205
202 562 3002	01	06	1	10:22	0	17	971205
202 562 3002	01	06	1	12:02	0	0	971205
202 562 3002	01	06	1	12:35	0	0	971205
202 562 3002	01	06	1	09:35	0	7	971205
202 562 3002	01	06	1	17:09	0	16	971205
202 562 3002	01	06	1	11:58	0	17	971205
202 562 3002	01	06	1	15:17	0	4	971205
202 562 3002	01	06	1	16:02	0	10	971205
202 562 3002	01	06	1	16:45	0	8	971205
202 562 3002	01	06	1	08:38	0	53	971205
202 562 3002	01	06	1	16:20	0	59	971205
202 562 3002	01	06	1	11:55	0	0	971205
202 562 3002	01	06	1	12:04	0	14	971205
202 562 3002	01	06	1	13:28	3	14	971205

MONTH	DAY	COUNT
01	06	1
01	07	1
01	17	1
01	21	1
12	05	1
12	15	1
12	19	1
TOTAL		19

END OF 202 4566566
 CALLS FOR 202 4566593
 ORIG # MONTH DAY CARRIER TERM # COUNT
 202 331 3849 555 202 456 2990 02:42
 202 342 0444 555 202 456 2990 09:45
 202 331 2093 555 202 456 2990 09:58
 202 986 0564 555 202 456 2990 10:05
 202 403 1111 555 202 456 2990 10:08
 202 628 3706 555 202 456 2990 10:10
 202 342 0444 555 202 456 2990 10:39
 202 437 0009 555 202 456 2990 10:47
 202 986 0564 555 202 456 2990 10:58
 202 737 9274 555 202 456 2990 11:05
 202 342 0444 555 202 456 2990 11:25
 202 726 3033 555 202 456 2990 11:49
 202 965 6355 555 202 456 2990 12:45
 202 965 6355 555 202 456 2990 13:11
 202 965 6355 555 202 456 2990 13:24
 202 965 6355 555 202 456 2990 13:44
 202 965 6355 555 202 456 2990 14:01
 202 965 6355 555 202 456 2990 14:07
 202 965 6355 555 202 456 2990 15:15
 202 965 6355 555 202 456 2990 15:43
 202 965 6355 555 202 456 2990 16:03
 202 965 6355 555 202 456 2990 16:21
 202 965 6355 555 202 456 2990 16:34
 202 965 6355 555 202 456 2990 16:36
 202 965 6355 555 202 456 2990 17:08
 202 965 6355 555 202 456 2990 18:08

ORIG #	MONTH	DAY	CARRIER	TERM #	CONNECT	MIN	SEC	DATE
202 331 3849	01	06	555	202 456 2990	02:42	0	7	971205
202 342 0444	01	06	555	202 456 2990	09:45	1	20	971205
202 331 2093	01	06	555	202 456 2990	09:58	0	31	971205
202 986 0564	01	06	555	202 456 2990	10:05	0	17	971205
202 403 1111	01	06	555	202 456 2990	10:08	0	37	971205
202 628 3706	01	06	555	202 456 2990	10:10	0	17	971205
202 342 0444	01	06	555	202 456 2990	10:39	0	5	971205
202 437 0009	01	06	555	202 456 2990	10:47	0	1	971205
202 986 0564	01	06	555	202 456 2990	10:58	1	8	971205
202 737 9274	01	06	555	202 456 2990	11:05	0	39	971205
202 342 0444	01	06	555	202 456 2990	11:25	0	32	971205
202 726 3033	01	06	555	202 456 2990	11:49	0	19	971205
202 965 6355	01	06	555	202 456 2990	12:45	0	45	971205
202 965 6355	01	06	555	202 456 2990	13:11	0	10	971205
202 965 6355	01	06	555	202 456 2990	13:24	0	15	971205
202 965 6355	01	06	555	202 456 2990	13:44	1	14	971205
202 965 6355	01	06	555	202 456 2990	14:01	0	15	971205
202 965 6355	01	06	555	202 456 2990	14:07	4	3	971205
202 965 6355	01	06	555	202 456 2990	15:15	2	31	971205
202 965 6355	01	06	555	202 456 2990	15:43	0	43	971205
202 965 6355	01	06	555	202 456 2990	16:03	0	4	971205
202 965 6355	01	06	555	202 456 2990	16:21	0	3	971205
202 965 6355	01	06	555	202 456 2990	16:34	0	31	971205
202 965 6355	01	06	555	202 456 2990	16:36	0	3	971205
202 965 6355	01	06	555	202 456 2990	17:08	0	56	971205
202 965 6355	01	06	555	202 456 2990	18:08	2	39	971205

ORIG #	MONTH	DAY	CARRIER	TERM #	CONNECT	MIN	SEC	DATE
202 965 6355	01	06	555	202 456 2990	18:24	1	40	971205
202 965 6355	01	06	555	202 456 2990	18:41	2	0	971205
202 965 6355	01	06	555	202 456 2990	19:19	0	5	971205
202 965 6355	01	06	555	202 456 2990	08:41	0	0	971206
202 965 6355	01	06	555	202 456 2990	08:51	0	17	971206
202 965 6355	01	06	555	202 456 2990	09:17	0	21	971206
202 965 6355	01	06	555	202 456 2990	09:19	0	10	971206
202 965 6355	01	06	555	202 456 2990	09:21	0	10	971206
202 965 6355	01	06	555	202 456 2990	10:01	0	5	971206
202 965 6355	01	06	555	202 456 2990	10:37	0	16	971206
202 965 6355	01	06	555	202 456 2990	10:38	0	29	971206
202 965 6355	01	06	555	202 456 2990	10:48	6	51	971206
202 965 6355	01	06	555	202 456 2990	10:57	56	23	971206
202 965 6355	01	06	555	202 456 2990	11:37	1	48	971215
202 965 6355	01	06	555	202 456 2990	09:00	0	39	971215
202 965 6355	01	06	555	202 456 2990	09:08	0	4	971215
202 965 6355	01	06	555	202 456 2990	09:24	0	30	971215
202 965 6355	01	06	555	202 456 2990	09:31	4	19	971215
202 965 6355	01	06	555	202 456 2990	09:51	4	7	971215
202 965 6355	01	06	555	202 456 2990	09:56	0	35	971215
202 965 6355	01	06	555	202 456 2990	10:02	0	55	971215
202 965 6355	01	06	555	202 456 2990	10:06	0	10	971215
202 965 6355	01	06	555	202 456 2990	10:09	4	33	971215
202 965 6355	01	06	555	202 456 2990	10:14	4	33	971215
202 965 6355	01	06	555	202 456 2990	10:14	0	21	971215
202 965 6355	01	06	555	202 456 2990	10:39	0	12	971215
202 965 6355	01	06	555	202 456 2990	10:45	0	3	971215
202 965 6355	01	06	555	202 456 2990	10:54	2	17	971215
202 965 6355	01	06	555	202 456 2990	11:12	0	25	971215
202 965 6355	01	06	555	202 456 2990	11:39	0	23	971215
202 965 6355	01	06	555	202 456 2990	12:36	1	26	971215
202 965 6355	01	06	555	202 456 2990	13:13	0	20	971215
202 965 6355	01	06	555	202 456 2990	13:14	0	25	971215
202 965 6355	01	06	555	202 456 2990	13:19	0	0	971215
202 965 6355	01	06	555	202 456 2990	13:33	0	52	971215
202 965 6355	01	06	555	202 456 2990	13:50	0	38	971215
202 965 6355	01	06	555	202 456 2990	14:27	0	49	971215
202 965 6355	01	06	555	202 456 2990	16:27	0	8	971215
202 965 6355	01	06	555	202 456 2990	16:33	0	9	971215
202 965 6355	01	06	555	202 456 2990	16:43	0	13	971215
202 965 6355	01	06	555	202 456 2990	16:47	0	8	971215
202 965 6355	01	06	555	202 456 2990	16:59	0	18	971215
202 965 6355	01	06	555	202 456 2990	17:25	0	36	971215
202 965 6355	01	06	555	202 456 2990	17:28	0	5	971215
202 965 6355	01	06	555	202 456 2990	17:30	0	37	971215
202 965 6355	01	06	555	202 456 2990	18:10	0	0	971215
202 965 6355	01	06	555	202 456 2990	19:03	0	25	971215
202 965 6355	01	06	555	202 456 2990	10:03	0	11	971219
202 965 6355	01	06	555	202 456 2990	11:11	5	7	971219
202 965 6355	01	06	555	202 456 2990	12:51	1	16	971219
202 965 6355	01	06	555	202 456 2990	13:02	0	49	971219
202 965 6355	01	06	555	202 456 2990	13:18	0	18	971219
202 965 6355	01	06	555	202 456 2990	13:56	0	33	971219
202 965 6355	01	06	555	202 456 2990	14:37	0	10	971219
202 965 6355	01	06	555	202 456 2990	15:24	0	40	971219
202 965 6355	01	06	555	202 456 2990	15:38	1	46	971219
202 965 6355	01	06	555	202 456 2990	15:59	2	13	971219
202 965 6355	01	06	555	202 456 2990	16:28	3	46	971219
202 965 6355	01	06	555	202 456 2990	16:32	0	13	971219
202 965 6355	01	06	555	202 456 2990	17:08	0	50	971219
202 965 6355	01	06	555	202 456 2990	17:31	0	7	971219
202 965 6355	01	06	555	202 456 2990	18:21	0	0	971219
202 965 6355	01	06	555	202 456 2990	19:35	0	0	971219

1216-DG-00000008

Name**Phone Numbers**

Currie, Betty**2023951831****2024562990****2024566703****7032431453**